

Appl. No. 09/993,195  
Amdt. dated Jan. 5, 2005  
Reply to Office action of Oct. 5, 2004

## REMARKS

In response to the Office Action dated October 5, 2004, Applicant respectfully requests reconsideration based on the above amendment and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

Claims 1-5 are pending in the Application. The specification has been amended to bring the abstract of the disclosure into compliance with MPEP §608.01(b). No new matter has been added by the amendment.

Regarding the priority document, the Examiner asserts that no certified copy of the Korean application has been filed. Applicant submits that a certified copy of the Korean Patent Application No. 10-2000-0072297 was filed on December 4, 2001. Attached herewith are copies of the Claim for Priority and cover page of the Korean Patent Application filed on December 4, 2001, and a copy of the post card which has been stamped by the Patent Office.

### *Claim Rejections Under 35 U.S.C. §102(b)*

Claims 1-5 were rejected under 35 U.S.C. §102(b) as being anticipated by Das et al., U.S. Patent No. 5,896,176 (hereinafter "Das").

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). It is submitted that Das fails to teach each and every element as set forth in the claim 1 for at least the reasons described below.

Claim 1 recites, *inter alia*, a knowledge database for storing the image data to a database in an appropriate form by applying a prior knowledge.

In contrast, Das merely discloses a video compression device that compares current frames to previous frames to determine regions of difference or regions of interest (see col. 7, lines 18-22; and col. 11, lines 33-37). In the rejection of claim 1, the Examiner has indicated that the region of interest map corresponds to the prior knowledge of the claimed invention. Applicant respectfully traverses the Examiner's analysis. The region of interest map is created as a result of determining the difference between a current image and a previous stored image (col. 13, lines 15-27). The region of interest map does not represent prior knowledge of the image,

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but rather it represents *current knowledge* of the difference between the previous stored image and the current stored image. Furthermore, the region of interest map is limited to the image domain and is ignorant of temporal and special characteristics of the imaging system. On the contrary, the prior knowledge of the present invention includes characteristics of the imaging system like, for example, mobility and timing. Thus, for the reasons stated above, Das fails to teach a knowledge database for storing the image data to a database in an appropriate form by applying a prior knowledge, as claimed in claim 1

Claim 1 also recites, *inter alia*, a hierarchical image compressor for compressing each of the split hierarchical images. The prior knowledge of the present invention is used to divide image data into hierarchical images. Each of the hierarchical images is compressed and stored separately and later reconstructed. The Examiner has stated that in Das, each hierarchical image is compressed by a wavelet compressor that is a hierarchical image compressor. Applicant respectfully traverses the Examiner's analysis. To the contrary, the region of interest map is transmitted to control which areas of the residual image are filtered, encoded and later reconstructed. The Examiner is apparently equating only each region of interest in Das with a hierarchical image, since it is only region of interest data that is encoded and filtered. Data outside the region of interest is not encoded or filtered (col. 13, lines 38-41, 45-48). Hierarchical images, however, include for example, background information that would not be encoded and filtered in Das. Thus, for the reasons stated above, Das fails to teach a hierarchical image compressor for compressing each of the split hierarchical images, as claimed in claim 1.

Accordingly, claim 1 is believed to be patentably distinct and nonobvious in view of Das.

Claim 2 recites, *inter alia*, a step of constructing a knowledge database by applying a prior knowledge to an inputted image.

As discussed above regarding claim 1, Das fails to teach each and every element of claim 2. Since the region of interest map is not prior knowledge, Das fails to teach or suggest applying a prior knowledge to the inputted image. Additionally, since Das fails to teach or suggest a hierarchical image compressor for compressing each of the split hierarchical images since, as discussed above regarding claim 1, Das fails to teach or suggest a step of compressing the split hierarchical data according to the corresponding split hierarchies, as recited in claim 2.

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Accordingly, claim 2 is believed to be patentably distinct and nonobvious in view of Das. Claims 3-5 depend either directly or indirectly from claim 2, thus include all the limitations of claim 2. Thus, claims 3-5 are believed to be allowable for at least the reasons given for claim 2, which is believed to be allowable.

Accordingly, Applicant respectfully requests that the Examiner reconsider the rejections of claims 1-5 under 35 U.S.C. §102(b).

***New Claim***

Claim 6 has been added to more particularly define aspects of the present invention. Claim 6 includes no new matter and is fully supported by the specification and the drawings of the present application.

Accordingly, it is believed that claim 6 is in condition for allowance.

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**Conclusion**

In view of the foregoing, it is respectfully submitted that the instant application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicant's attorneys would be advantageous to the disposition of this case, the Examiner is cordially requested to telephone the undersigned.

In the event the Commissioner of Patents and Trademarks deems additional fees to be due in connection with this application, Applicant's attorney hereby authorizes that such fee be charged to Deposit Account No. 06-1130.

Respectfully submitted,

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